

EXHIBIT F

UNITED STATES DISTRICT COURT
for the
SOUTHERN DISTRICT OF NEW YORK

DR. PAUL M. CONTI,)
)
Plaintiff,)
)
vs.) Case No. 17-CV-9268
)
JOHN DOE,)
)
Defendant.)
_____)

CONFIDENTIAL

VIDEOTAPED DEPOSITION OF N. GREGORY HAMILTON, M.D.

Taken on behalf of Defendant

* * *

BE IT REMEMBERED THAT, pursuant to the
Federal Rules of Civil Procedure, the deposition
of N. GREGORY HAMILTON, M.D., was taken before KIM
NERHEIM, a Certified Shorthand Reporter for Oregon,
on Thursday, May 9, 2019, commencing at the
hour of 9:43 a.m., in the law offices of
Holland & Knight, 111 S.W. 5th Avenue, Suite 2300,
Portland, Oregon.

APPEARANCES:

JUDD BURSTEIN, P.C.

BY MR. PETER B. SCHALK

5 Columbus Circle

New York, New York 10019

212-974-2400

pschalk@burlaw.com

Attorney for Plaintiff.

EMERY, CELLI, BRINCKERHOFF & ABADY, LLP

BY MS. KATHERINE ROSENFELD

BY MR. DOUG LIEB

600 Fifth Avenue, 10th Floor

New York, New York 10020

212-763-5000

krosenfeld@ecbalaw.com

dlieb@ecbalaw.com

Attorneys for Defendant.

LINDSAY HART, LLP

BY MS. CONNIE ELKINS McKELVEY

1300 S.W. 5th Avenue, Suite 3400

Portland, Oregon 97201

503-226-7677

cmckelvey@lindsayhart.com

Attorney for Witness.

ALSO PRESENT: Paul Conti, Lani Milton, videographer

* * *

1 (Deposition Exhibit No. 1065,
2 Exhibit No. 1066, Exhibit No. 1069, and
3 Exhibit No. 1070 were marked for identification.)

4 THE VIDEOGRAPHER: We are now on the record.
5 Today's date is Thursday, May 9th, 2019, and the time is
6 approximately 9:43 a.m. My name is Lani Milton, I'm the
7 videographer representing LNS Court Reporting, here with
8 court reporter Kim Nerheim, also in association with LNS
9 Court Reporting.

10 This is the videotaped deposition of Dr. N.
11 Gregory Hamilton being taken in the matter of Dr. Paul
12 Conti versus John Doe. It is being held in the U.S.
13 District Court in the Southern District of New York. The
14 case number is 17-CV-9268. We are located today at
15 Holland & Knight in Portland, Oregon.

16 Counsel, can you please introduce yourselves
17 for the record and whom you represent.

18 MS. ROSENFELD: Sure. Katherine Rosenfeld,
19 Emery, Celli, Brinckerhoff & Abady, for plaintiff -- for
20 Defendant John Doe.

21 MR. LIEB: Doug Lieb, also for John Doe.

22 MR. SCHALK: Peter B. Schalk of Judd
23 Burstein, P.C., for the plaintiff/counterclaim defendant.

24 MS. MCKELVEY: Connie McKelvey, Lindsay
25 Hart, for Dr. Hamilton.

1 THE VIDEOGRAPHER: Thank you.

2 Our court reporter can now swear or affirm the
3 witness.

4
5 N. GREGORY HAMILTON, M.D.
6 having first been sworn by the Certified
7 Shorthand Reporter, testified under oath
8 as follows:

9
10 EXAMINATION

09:44:45 11 BY MS. ROSENFELD:

09:44:45 12 Q Good morning, Dr. Hamilton.

13 A Good morning.

09:44:48 14 Q We met off the record. My name is Katie Rosenfeld.
15 I'm one of the attorneys for John Doe in this matter, and
16 we're here today to conduct your deposition.

17 Have you ever been deposed before,
18 Dr. Hamilton?

19 A Yes, I have.

09:45:00 20 Q And when was the last time that you were deposed?

21 A I'm not sure. Probably more than a year ago.

09:45:07 22 Q What was the circumstance under which you were
23 deposed? Why did you have to give a deposition?

24 A I'm just trying to recall. I've been deposed a
25 number of times, but -- oh, about a malpractice case.

1 A I don't recall. We have discussed it at times.

16:29:58 2 Q Did Dr. Conti -- did his -- Has your view of the
3 threats changed over time as you've treated Dr. Conti?

4 A Well, they certainly changing today, now that I've
5 read them. I think they're worse than I had anticipated.

16:30:24 6 Q So chronologically speaking, if you started -- if
7 Dr. Conti started treating John Doe in
8 2017 --

9 MR. LIEB: John Doe.

16:30:39 10 Q BY MS. ROSENFELD: -- I'm sorry, John Doe in 2017
11 and -- withdrawn. Let me start again.

12 You've been treating Paul Conti throughout his
13 treatment of John Doe, the termination of that treatment,
14 and to date; is that correct?

15 A Yes.

16:30:52 16 Q How has the passage of time affected how you evaluate
17 the threats towards John Doe?

18 MS. McKELVEY: Objection to form.

19 MR. SCHALK: Objection to form.

16:31:02 20 Q BY MS. ROSENFELD: I'm sorry. How has the passage of
21 time impacted how you evaluate the threats towards Paul
22 Conti?

23 A I don't know.

16:31:11 24 Q Are you -- is your treatment any different with
25 respect to evaluating and helping him process those